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Attorneys for the Vanguard Claimants

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC COMPANY,

Debtors

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**JOINDER OF VANGUARD
CLAIMANTS IN SUPPORT OF
MOTION FOR THE APPLICATION
OF BANKRUPTCY RULE 7023 AND
THE CERTIFICATION OF A CLASS
OF SECURITIES CLAIMANTS**

Hearing Information:

Date: August 8, 2023
Time: 10:00 a.m. (Pacific Time)
Place: (Telephone Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: July 24, 2023

Related Docket No.: 13865

BANKRUPTCY CASE No. 19-30088 (DM)

JOINDER IN SUPPORT OF MOTION FOR THE APPLICATION OF BANKRUPTCY RULE 7023

1 The Vanguard Claimants,¹ by and through undersigned counsel, hereby submit this Joinder
2 in support of the “Securities Lead Plaintiffs’ Motion and Memorandum of Points and Authorities in
3 Support of Motion for the Application of Bankruptcy Rule 7023 and the Certification of a Class of
4 Securities Claimants” [Dkt. No. 13865] (the “**7023 Motion**”).

5 The Vanguard Claimants are among the many hundreds of claimants who filed proofs of
6 claim asserting Securities Claims against the Reorganized Debtors (“**Securities Claimants**”). The
7 Vanguard Claimants respectfully submit that implementing a class mechanism, as proposed in the
8 7023 Motion, will provide an efficient and coordinated means of adjudicating the common issues of
9 law and fact underlying the Securities Claims, promote judicial economy by eliminating the need for
10 the hundreds of Securities Claimants with unresolved Securities Claims to prosecute their claims
11 separately, protect the due process rights of the Securities Claimants, and foster equal treatment of

12
13 ¹ The Vanguard Claimants are comprised, individually, of the following funds, Vanguard Alternative Strategies Fund -
14 Volatility, Vanguard Annuity Balanced Fund, Vanguard Annuity Equity Index Fund, Vanguard Annuity Short Term
15 Investment Grade Fund, Vanguard Balanced Index, Vanguard CA Intermediate Term Tax Exempt Fund, Vanguard CA
16 Long Term Tax Exempt Fund, Vanguard CA Tax Exempt Money Market, Vanguard Capital Value Fund, Vanguard Core
17 Bond Fund, Vanguard Employee Benefit Index, Vanguard Equity Income, Vanguard Equity Income Annuity Fund,
18 Vanguard Global Wellesley Income Fund, Vanguard Global Wellington Fund, Vanguard Growth and Income Fund,
19 Vanguard High Yield Tax Exempt Fund, Vanguard Index 500 Fund, Vanguard Instit. Total Stock Market Index Fund,
20 Vanguard Institutional Index Fund, Vanguard Institutional Intermediate-Term Bond Fund, Vanguard Institutional Short-
21 Term Bond Fund, Vanguard Intermediate Tax Exempt Fund, Vanguard Intermediate Term Investment Grade Fund,
22 Vanguard Intermediate-Term Corporate Bond Index Fund, Vanguard Large Cap Index Fund, Vanguard Limited Term
23 Tax Exempt Fund, Vanguard Long Term Bond Index Fund, Vanguard Long Term Investment Grade Fund, Vanguard
24 Long Term Tax Exempt Fund, Vanguard Long-Term Corporate Bond Index Fund, Vanguard Market Neutral Fund -
25 EIG, Vanguard Mega Cap Index Fund, Vanguard Mega Cap Value Index Fund, Vanguard Municipal Cash Management
26 Fund, Vanguard Precious Metals & Mining Fund, Vanguard Russell 1000 Index Fund, Vanguard Russell 1000 Value
27 Index Fund, Vanguard Russell 3000 Index Fund, Vanguard S&P 500 Value Index Fund, Vanguard Selected Value Fund,
28 Vanguard Selected Value Fund, Vanguard Short Term Bond Index Fund, Vanguard Short Term Investment-Grade Fund,
Vanguard Short Term Tax Exempt Fund, Vanguard Short-Term Corporate Bond Index Fund, Vanguard SMA Bravo -
MSCI World Index, Vanguard SMA Charlie ZC - SP 500, Vanguard SMA EL SP 500, Vanguard Structured Broad
Market Fund, Vanguard Structured Large-Cap Equity Fund, Vanguard Tax Exempt Money Market, Vanguard Tax
Managed Capital Appreciation Fund, Vanguard Tax-Managed Balanced-Bond, Vanguard Tax-Managed Balanced-
Equity, Vanguard Total Bond Market II Index Fund, Vanguard Total Bond Market Index Fund, Vanguard Total Stock
MKT IDX Trust, Vanguard Total World Stock Index Fund, Vanguard U.S. Value Fund, Vanguard Ultra-Short-Term
Bond Fund, Vanguard US Minimum Volatility ETF, Vanguard US Value Factor ETF, Vanguard Utilities Index Fund,
Vanguard Value Index Fund, Vanguard Wellesley Income Fund, Vanguard Wellington Fund, Vanguard Windsor Fund
are the claimants advised by Vanguard Group, Inc. that submitted Securities Claims, which have been filed and registered
in the Reorganized Debtors’ claims register maintained by the claims administrator.

1 similarly-situated Securities Claimants. For these reasons, the Vanguard Claimants respectfully
2 request that the Court enter an order granting the 7023 Motion and such other and further relief as
3 the Court deems necessary and appropriate.

4 **RESERVATION OF RIGHTS**

5 The Vanguard Claimants reserve all of their respective rights, claims, defenses and remedies,
6 including without limitation, the right to amend, modify, or supplement this Joinder in accordance
7 with the applicable rules.

8 DATED: July 18, 2023

PROCOPIO, CORY, HARGREAVES &
9 SAVITCH LLP

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11 By: /s/ Gerald P. Kennedy
12 Gerald P. Kennedy
13 Attorneys for the Vanguard Claimants
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Bankruptcy Court for the Northern District of California by using CM/ECF system on July 18, 2023. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on July 18, 2023.

/s/ Gerald P. Kennedy
Gerald P. Kennedy